

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

NNABUGWU GOGOH,
Petitioner.

v.

JANET RENO, et al.,
Respondent.

X
X
X
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X
X
X
X
X
X

No.: 1:CV-00-1211

(JUDGE RAMBO)

FILED
CORANTON

AUG 24 2000

DEPUTY CLERK

PETITIONER'S MOTION FOR ENLARGEMENT OF TIME
FOR RESPONDING TO RESPONDENT'S RESPONSE

Petitioner Nnabugwu Gogoh, pro se, respectfully moves this Court for an Order enlarging time to respond to the respondents response up to and including September 3rd, 2000. This is the petitioner's first request for an extension of time in which to file his response. The reason therefore are stated below:

1. A responsive brief is due to be filed by August 23rd, 2000.

2. During the same period of time, in addition to preparing the response in this matter, petitioner is responsible for filing a brief to the Board of Immigration Appeals (BIA).

3. Petitioner does not have sufficient time to do a meaningful research to support his response.

4. Since petitioner is a pro se litigant and does not possess the intricate knowledge of the Immigration laws, in particular, the understanding of the District Court laws.

5. The opposing party will not be prejudiced as he intends to provide an answer to all issues raised by respondent in their response to Order to Show Cause so that there will be no miscarriage of justice.

6. As the result of the aforementioned litigation and other administrative problems, and due to the complexity of the issues presented by the case, petitioner needs the requested enlargement of time in order to properly prepare his response and thoroughly address the issues presented.

Wherefore, for all the reasons presented, the petitioner asks this Honorable Court to grant him extension for the response to the respondent's response to Order to Show Cause.

Dated: August , 2000.

Respectfully submitted,



NNABUGWU GOGOH - Pro Se.

CERTIFICATE OF SERVICE

CASE NAME:

NNABUGWO GOGOH

CASE NO:

NO.: 1:CV-00-1211

I HEREBY CERTIFY that on this 21st day of August, 2000

I cause to be served the :

**PETITIONER'S MOTION FOR ENLARGEMENT OF TIME
FOR RESPONDING TO RESPONDENT'S RESPONSE**

X

by placing a true copy thereof in a sealed envelope, with postage thereon fully prepaid and causing the same to be mailed by first class mail to the address set forth below.

by causing to be personally delivered a true copy thereon to the person at the address set forth below.

by FEDERAL EXPRESS: AIRBORNE EXPRESS to the person at the address set forth below.

by CERTIFIED MAIL - return receipt requested to the person at the address set forth below.

by TELEFAXING with acknowledgment of receipt to the person at the address set forth below.

ADDRESS OF THE PERSON(S) BEING SERVED

THE CLERK OF COURT)	ANNE K. FIORENZA
MIDDLE DISTRICT OF PENNSYLVANIA)	ASSISTANT U.S. ATTORNEY
235 N.WASHINGTON AVE.)	P.O.BOX 11754
P.O.BOX 1148)	HARRISBURG, PA 17108
SCRANTON, PA 18501)	

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 21st, 2000

Nnabugwu Gogoh
Signature